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*Attorneys for Plaintiff Mind Medicine (MindMed), Inc.*

**UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF NEVADA**

MIND MEDICINE (MINDMED) INC., a  
 British Columbia Corporation,

Plaintiff,

v.

SCOTT FREEMAN, an individual and FCM  
 MM HOLDINGS, LLC a Wyoming Limited  
 Liability Company,

Defendants.

Case No. 2:23-cv-01354-RFB-MDC

**STIPULATION FOR TEMPORARY STAY  
 OF CASE DEADLINES TO FACILITATE  
 POTENTIAL SETTLEMENT**

**(Second Request)**

1 Plaintiff Mind Medicine (MindMed) Inc. (“MindMed”) and Defendants Scott Freeman  
2 (“Dr. Freeman”) and FCM MM Holdings, LLC (“FCM”) (collectively, the “Parties”), by and  
3 through their respective counsel of record, stipulate and agree as follows:

4 1. On March 15, 2024, this Court entered an Order on the Parties’ Stipulation for  
5 Temporary Stay of Case Deadlines to Facilitate Potential Settlement (ECF No. 132). The  
6 temporary stay expires on April 5, 2024.

7 2. MindMed and Dr. Freeman are still finalizing the terms of a settlement agreement.

8 3. In order to facilitate the continued settlement negotiations, the Parties agree that the  
9 temporary stay entered on March 15, 2024 (ECF No. 132) should be extended for an additional  
10 thirty (30) days. The parties believe that this extension will assist them in finalizing and executing  
11 a settlement agreement.

12 4. In the event the Parties do not reach a final settlement, they will submit a proposed  
13 amended scheduling order in accordance with LR 26-3.

14 5. In accordance with the Parties’ agreement to extend the temporary stay for thirty  
15 (30) days, the parties also agree that MindMed’s Reply brief in support of its Motion for Entry of  
16 Confidentiality and Protective Order (ECF No. 123) will be due on May 8, 2024.

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6. This is the second request for a temporary stay of all case deadlines. It is the third request for an extension of time for MindMed to file its Reply brief in support of its Motion for Entry of Confidentiality and Protective Order. This stipulation is made in good faith for the reasons outlined above and not for the purpose of delay.

DATED this 5th day of April, 2024.

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DATED this 5th day of April, 2024.

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DATED this 5th day of April, 2024.

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### ORDER

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: 4-9-24